

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TZEW HOLDCO LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 20-10910 (CSS)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. 542**

**AMENDED<sup>2</sup> NOTICE OF AGENDA FOR TELEPHONIC HEARING SCHEDULED FOR FEBRUARY 17, 2021 AT 2:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5th FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING  
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE VIA ZOOM,  
PARTIES SHOULD USE THE FOLLOWING INSTRUCTIONS:**

**Topic: TZEW 20-10910 - Omnibus**

**Time: February 17, 2021 at 2:00 p.m. Eastern Time (US and Canada)**

**Join Zoom Hearing: <https://debuscourts.zoomgov.com/j/1602089165>**

**Meeting ID: 160 208 9165**

**Password: 845973**

**TO APPEAR TELEPHONICALLY VIA COURTCALL, PARTIES MUST MAKE PRIOR  
ARRANGEMENTS WITH COURTCALL BY  
TELEPHONE (866-582-6878) OR FACSIMILE (866-533-2946)**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PP Group, LLC (5579); PP Property Holdings, LLC (1013); PP Parks Beverage Company, LLC (2339); PP Parks Holdings, LLC (7913); PP Parks Management, LLC (2937); TZEW Holdco LLC (0252); TZEW Intermediate Corp. (1058). The location of the Debtors' service address in these chapter 11 cases is: c/o Paladin Management, 633 W. 5th Street, 28th Floor, Los Angeles, CA 90071.

<sup>2</sup> Amended items are in bold.

**RESOLVED MATTERS:**

1. Motion of Ashli Weber for Relief From the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code [Filed: 1/18/21] ([Docket No. 508](#)).

Response Deadline: January 31, 2021, at 4:00 p.m. (*extended to a date to be determined*)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Order Granting Ashli Weber Relief From the Automatic Stay [Filed: 1/28/21] ([Docket No. 508](#)).

Status: The Debtors and movant have agreed to a form of order approving the motion. The movant shall submit the order under certification for the Court's approval. No hearing is necessary unless requested by the Court.

2. Motion of Corane Pettigrew, Individually as the Natural Parent and Guardian of Taylor Pettigrew, for Relief From the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code [Filed: 1/22/21] ([Docket No. 516](#)).

Response Deadline: February 3, 2021, at 11:00 a.m. (*extended to a date to be determined*)

Responses Received:

- a. Debtors' Preliminary Response to Motion of Corane Pettigrew for Relief From the Automatic Stay [Filed: 1/27/21] ([Docket No. 523](#)).

Related Documents:

- a. [Proposed] Order Granting Motion for Relief From the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Filed: 1/22/21] ([Docket No. 516](#)).
- b. Stipulation Providing Corane Pettigrew Relief From the Automatic Stay to Pursue State Court Action Against Debtors [Filed: 2/16/21] ([Docket No. 544](#)).**

Status: **The movant has filed a stipulation resolving this matter.** No hearing is necessary unless requested by the Court.

**ADJOURNED MATTER:**

3. Motion of Protective Life Insurance Company for Authorization to Exercise Recoupment Rights or, In the Alternative, for Relief From the Automatic Stay to Exercise Setoff Rights [Filed: 1/19/21] ([Docket No. 510](#)).

Response Deadline: January 27, 2021, at 4:00 p.m. (*extended to a date to be determined*)

Responses Received:

- a. Debtors' Preliminary Response to Motion of Protective Life Insurance Company for Authorization to Exercise Recoupment Rights or, in the Alternative, for Relief From the Automatic Stay [Filed: 1/27/21] ([Docket No. 524](#)).

Related Documents:

- a. [Proposed] Order Granting Motion of Protective Life Insurance Company for Authorization to Exercise Recoupment Rights or, In the Alternative, for Relief From the Automatic Stay to Exercise Setoff Rights [Filed: 1/19/21] ([Docket No. 510, Exhibit A](#)).

Status: This matter is adjourned to a date to be determined.

**MATTERS GOING FORWARD:**

4. Debtors' Motion to Convert Cases From Chapter 11 to Chapter 7 of the Bankruptcy Code [Filed: 12/31/20] ([Docket No. 491](#)).

Response Deadline: January 22, 2021, at 4:00 p.m.

Responses Received:

- a. Letter Response of Anthony J. Passanisi to Debtors' Motion to Convert Cases From Chapter 11 to Chapter 7 of the Bankruptcy Code [Filed: 1/21/21] ([Docket No. 521](#)).

Related Documents:

- a. [Proposed] Order Converting Case From Chapter 11 to Chapter 7 of the Bankruptcy Code [Filed: 12/31/20] ([Docket No. 491](#)).

Status: This matter will go forward.

5. Motion of Matthew Douglas and Shaeley Cooper, as Parents and Natural Guardians of B.C., Deceased, for Relief From the Automatic Stay to Pursue Their Case Against Debtors Which is Currently Pending in the U.S. District Court for the Northern District of Indiana [Filed: 1/14/21] ([Docket No. 505](#)).

Response Deadline: January 28, 2021, at 4:00 p.m.

Responses Received:

- a. Debtors' Preliminary Response to Motion of Matthew Douglas and Shaeley Cooper for Relief From the Automatic Stay [Filed: 1/27/21] ([Docket No. 522](#)).

- b. APX Operating Company, LLC's Objection to Motion of Matthew Douglas and Shaeley Cooper for Relief From the Automatic Stay [Filed: 1/28/21] ([Docket No. 525](#)).

Replies Received:

- a. Reply of Matthew Douglas and Shaeley Cooper, as Parents and Natural Guardians of B.C., Deceased, to APX Operating Company, LLC's Objection to Motion of Matthew Douglas and Shaeley Cooper for Relief From the Automatic Stay [Filed: 2/11/21] ([Docket No. 536](#)).

Related Documents:

- a. [Proposed] Order Granting the Motion of Matthew Douglas and Shaeley Cooper, as Parents and Natural Guardians of B.C., Deceased, for Relief From the Automatic Stay to Pursue Their Case Against Debtors Which is Currently Pending in the U.S. District Court for the Northern District of Indiana [Filed: 1/14/21] ([Docket No. 505](#)).
- b. **Certification of Counsel Regarding Resolution of Motion of Matthew Douglas and Shaeley Cooper, as Parents and Natural Guardians of B.C., Deceased, for Relief From the Automatic Stay to Pursue Their Case Against Debtors Which is Currently Pending in the U.S. District Court for the Northern District of Indiana [Filed: 2/16/21] ([Docket No. 541](#)).**
  - (i) **[Signed] Order Granting the Motion of Matthew Douglas and Shaeley Cooper, as Parents and Natural Guardians of B.C., Deceased, for Relief From the Automatic Stay to Pursue Their Case Against Debtors Which is Currently Pending in the U.S. District Court for the Northern District of Indiana [Filed: 2/16/21] ([Docket No. 543](#)).**

**Status:** The Court has entered an order on this matter.

**FINAL FEE APPLICATIONS:**

- 6. Final Fee Applications are scheduled to go forward at this hearing. Attached hereto as Exhibit A is a complete list of those final fee applications scheduled to be heard. The items listed on Exhibit A hereto correspond to the order of the fee applications, and documents related thereto, that were previously submitted to the Court, pursuant to the Court's Chambers' Procedures.

Responses Received: None.

Related Documents: None.

Status: This matter will go forward.

Dated: February 16, 2021

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Timothy P. Cairns

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